

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: OCT 10 2007

**SO ORDERED**

ECF CASE  
JUDGE DANIELS

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----  
**JOE HAND PROMOTIONS, INC.,** as  
Broadcast Licensee of the **June 11, 2005**  
**Tyson/McBride Program,**

Plaintiff,

- against -

**RICARDO MARTINEZ,** Individually and d/b/a  
**LUCKY 7,**

and

**LUCKY 7**

Defendants.  
-----

*George B. Daniels*  
**HON. GEORGE B. DANIELS**

**OCT 09 2007**

**MOTION FOR CONTINUANCE**  
Civil Action No. 07-CV-6907  
**HON. GEORGE B. DANIELS**

Come now plaintiff, J & J SPORTS PRODUCTIONS, INC., and moves this Court for an Order of Continuance to adjourn the Conference from October 10, 2007 at 9:30 a.m.

Plaintiff has filed a Request for Clerk's Entry of Default in this matter and upon receipt of the Clerk's Certificate of Default, will prepare and file a Motion for Default Judgment.

Attached hereto is a proposed order for the Court setting forth the proposed relief requested herein.

Respectfully Submitted,

Dated: October 5, 2007  
Ellenville, NY 12428

/s/ Julie Cohen Lonstein  
**JULIE COHEN LONSTEIN, ESQ.**  
Attorney for Plaintiff  
Bar Roll No. JL8521  
**LONSTEIN LAW OFFICE, P.C.**  
1 Terrace Hill : P.O. Box 351  
Ellenville, NY 12428  
Telephone: (845) 647-8500  
Facsimile: (845) 647-6277

ECF CASE  
JUDGE DANIELS

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

---

**JOE HAND PROMOTIONS, INC.,** as  
Broadcast Licensee of the **June 11, 2005**  
**Tyson/McBride Program,**

Plaintiff,

**CERTIFICATE OF SERVICE**  
Civil Action No. 07-CV-6907  
HON. GEORGE B. DANIELS

-against-

RICARDO MARTINEZ, Individually and d/b/a  
LUCKY 7,

and

LUCKY 7

Defendants

---

The undersigned certifies that on the 5<sup>th</sup> day of October 2007 your deponent served the following documents by regular mail:

Motion for Continuance of Conference

on the following:

Ricardo Martinez  
1203 Findlay Avenue  
Apt. 33A  
Bronx, NY 10456-4143

Lucky 7  
658 Dawson Street  
Bronx, NY 10455

/s/ Julie Cohen Lonstein  
Julie Cohen Lonstein